



- (3) An explanation for why Mr. Robinson's campaign publicly called the amendment to the Complaint "legalese" in an effort to eliminate any efficacy the amendment had. Moreover, Robinson did not distance himself from his campaign's comments or deny that they were made with his permission.
- (4) Any type of proposed alternative sanction. To that end, Mr. Robinson says in his brief that Money has not been harmed by the violation. That is not the case, as the publicity Robinson caused is detrimental to Money's defense and the ability to obtain a fair jury. And, a sanction is not compensatory damages – they are not the same thing. A sanction is necessary to prevent a future litigant from violating the rule, then amending when called on it, but then announcing that the amendment is due to mere "legalese" and the prayer for relief in the original complaint is valid.

Something has to be done. Mr. Robinson's behavior is not appropriate. He violated a rule, made a spectacle of it, only fixed it when called out, then announced the fix was not sincere through his campaign. He has offered no other solution. Thus, Money asks that his case be dismissed. Alternately, Money asks for a mere 1% of what Robinson says his case is worth - \$500,000, less than the prejudgment interest would be on a \$50,000,000 award.

This the 5<sup>th</sup> day of December 2024.

/s/ Andrew L. Fitzgerald  
Andrew L. Fitzgerald, N.C.S.B. No. 31522  
D. Stuart Punger, Jr., N.C.S.B. No. 35517  
FITZGERALD HANNA & SULLIVAN, PLLC  
119 Brookstown Avenue, Suite 402  
Winston-Salem, NC 27101  
Telephone/Fax: 336-793-4696  
[andy@fhslitigation.com](mailto:andy@fhslitigation.com)  
[stuart@fhslitigation.com](mailto:stuart@fhslitigation.com)

/s/ Peter D. Zellmer

Peter D. Zellmer  
Peter D. Zellmer, PLLC  
421 N. Edgeworth Street  
Greensboro, NC 27401  
Telephone: 336-274-1168  
[Peter.Zellmer@zellmerlegal.com](mailto:Peter.Zellmer@zellmerlegal.com)

*Counsel for Louis Love Money*

## CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date served a copy of the foregoing REPLY BRIEF IN SUPPORT OF MOTION TO DISMISS upon all other parties to this action by electronically filing with the File & Serve System which will send electronic notification to the following:

### ADDRESSEE(S):

Anthony J. Biller  
Envisage Law  
2601 Oberlin Road, Suite 100  
Raleigh, NC 27608  
Phone: (919) 755-1317  
Fax: (919) 782-0452  
[ajbiller@envisage.law](mailto:ajbiller@envisage.law)

Jesse R. Binnall  
Jason C. Greaves  
BINNALL LAW GROUP, PLLC  
717 King Street, Suite 200  
Alexandria, Virginia 22314  
Phone: (703) 888-1943  
Fax: (703) 888-1930  
[jesse@binnall.com](mailto:jesse@binnall.com)  
[jason@binnall.com](mailto:jason@binnall.com)

Mark Nebrig

Katherine Bolger

Kaitlin Price

[kaitlinprice@mvalaw.com](mailto:kaitlinprice@mvalaw.com)

[marknebrig@mvalaw.com](mailto:marknebrig@mvalaw.com)

[katebolger@dwt.com](mailto:katebolger@dwt.com)

Attorneys for CNN

This the 5<sup>th</sup> day of November 2024.

/s/ Andrew L. Fitzgerald  
Andrew L. Fitzgerald, N.C.S.B. No. 31522  
D. Stuart Pungert, Jr., N.C.S.B. No. 35517  
FITZGERALD HANNA & SULLIVAN, PLLC  
119 Brookstown Avenue, Suite 402  
Winston-Salem, NC 27101  
Telephone/Fax: 336-793-4696  
[andy@fhslitigation.com](mailto:andy@fhslitigation.com)  
[stuart@fhslitigation.com](mailto:stuart@fhslitigation.com)

